

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF IOWA**

In re:	)	Chapter 11
	)	
MERCY HOSPITAL, IOWA CITY,	)	Case No. 23-00623 (TJC)
IOWA, <i>et al.</i>	)	
	)	(Jointly Administered)
Debtors.	)	
	)	<b>EXPEDITED RELIEF REQUESTED</b>

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**MERCY HEALTH NETWORK, INC.’S EXPEDITED MOTION FOR ENTRY OF AN  
ORDER SETTING MOTION TO EXTEND DEADLINE TO PRODUCE RESPONSIVE  
DOCUMENTS AND COMMUNICATIONS TO THE OC**

Mercy Health Network Inc., d/b/a MercyOne (“MercyOne”), by its attorneys, Foley & Lardner LLP and Belin McCormick, respectfully submits this motion (the “Motion”) for entry of an order substantially in the form attached hereto as **Exhibit A** (the “Proposed Order”), setting *Mercy Health Network, Inc.’s Expedited Motion to Extend the Deadline to Produce Responsive Documents and Communications to the OC* (the “Extension Motion”), filed contemporaneously herewith, for hearing on May 9, 2025 at the already-scheduled hearing in this case. In support of this Motion, MercyOne respectfully states as follows:

1. Pursuant to the *Order Granting Motion of the Trust Oversight Committee Requiring MercyOne to Produce Records and Submit to Examination Pursuant to Bankruptcy Rule 2004* [Docket No. 1854] (the “Rule 2004 Order”),<sup>1</sup> MercyOne has until May 12, 2025, to produce responsive documents and communications to the OC’s Rule 2004 document requests.

2. As detailed in the Extension Motion, MercyOne is currently in the middle of a complex electronic medical record conversion while also compiling documents in compliance with the Rule 2004 Order. Because of these competing and time-consuming demands, MercyOne is requesting to extend May 12 production deadline through and including to May 23, 2025.

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<sup>1</sup> All capitalized terms not defined herein shall have the meanings affixed to them in the Order.

3. Counsel for MercyOne and the OC have been engaging in good faith discussion about the requested extension, but as the date hereof, have not reached an agreement.

4. As such, and in light of the upcoming May 12 deadline, MercyOne respectfully requests this Court grant the instant Motion and schedule the Extension Motion for May 9, 2025, at the already-scheduled hearing in this case.

**WHEREFORE**, MercyOne respectfully requests entry of an order, substantially in the form attached hereto as **Exhibit A**, scheduling the Extension Motion for May 9, 2025 at 2:00 p.m.

Dated: May 8, 2025

Respectfully submitted,

/s/ David B. Goroff

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*Counsel to Mercy Health Network, Inc., d/b/a  
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**CERTIFICATE OF SERVICE**

The undersigned certifies, under penalty of perjury, that on May 8, 2025, the foregoing document was electronically filed with the Clerk of Court using the Northern District of Iowa CM/ECF and the document was served electronically through the CM/ECF system to the parties of the Chapter 11 Cases.

/s/ David B. Goroff

David B. Goroff